

GIBSON DUNN

Gibson, Dunn & Crutcher LLP

200 Park Avenue
New York, NY 10166-0193
Tel 212.351.4000
www.gibsondunn.com

Randy M. Mastro
Direct: +1 212.351.3825
Fax: +1 212.351.5219
RMastro@gibsondunn.com

December 16, 2013

VIA HAND DELIVERY

Honorable Lewis A. Kaplan
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Chevron Corp. v. Donziger*, No. 11 Civ. 0691 (LAK)

Dear Judge Kaplan:

I write as counsel for plaintiff Chevron Corporation (“Chevron”) to forward to the Court a letter from G. Robert Blakey, now a professor at Notre Dame Law School, who was involved in the drafting of the RICO statute at the time of its enactment, requesting permission to file an amicus brief (a copy of which is also enclosed) on the legal issue of whether the RICO statute permits a private civil litigant to obtain equitable relief. As a logistical courtesy to Professor Blakey, we are e-filing and submitting his letter (and proposed amicus brief) to Your Honor at his request.

Respectfully,

/s/ Randy M. Mastro

Randy M. Mastro

cc: All counsel of record (w/ encl.)